

Reid Rubinstein & Bogatz
I. SCOTT BOGATZ, ESQ.
Nevada Bar No. 3367
JAIME STILZ, ESQ.
Nevada Bar No. 13772
300 South Fourth Street, Suite 830
Las Vegas, Nevada 89101
Telephone: (702) 776-7000
Facsimile: (702) 776-7900
sbogatz@rrblf.com
jstilz@rrblf.com
Attorneys for Defendant American Express

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THOMAS A. O'CONNELL,

Plaintiff,

vs.

AMERICAN EXPRESS COMPANY; BANK
OF AMERICA; JPMORGAN CHASE BANK,
NA; FRANKLIN CAPITAL CORPORATION;
SHELL/CBNA; SYNCB/CHEVRON; WELLS
FARGO/DILLARDS; and EQUIFAX
INFORMATION SERVICES, LLC,

Defendants.

Case No.: 2:18-cv-00743-RFB-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
AMERICAN EXPRESS TO FILE
RESPONSE TO PLAINTIFF'S
COMPLAINT [DOC. #1]**

IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff THOMAS A. O'CONNELL ("Plaintiff" or "Mr. O'Connell"), through his attorneys, the law firm of Haines & Krieger, LLC, and Defendant AMERICAN EXPRESS (incorrectly named in this matter as "American Express Company" and referred to herein as "American Express"), through its attorneys, the law firm of Reid Rubinstein & Bogatz, that American Express shall have up to and including June 22, 2018 to file an Answer or otherwise respond to Plaintiff's Complaint [Doc. No. 1], which was filed in this matter on April 24, 2018. This extension of time is necessary to allow American Express time to engage in investigation and settlement negotiations. This is American

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Express' first request for an extension, and it is made in good faith and not for the purposes of delay.

Dated this 22nd day of May, 2018.

Dated this 22nd day of May, 2018.

REID RUBINSTEIN & BOGATZ

HAINES & KRIEGER, LLC

By: /s/ Jaimie Stilz, Esq.

By: /s/ David H. Krieger, Esq.

I. Scott Bogatz, Esq.
Nevada Bar No. 3367
Jaimie Stilz, Esq.
Nevada Bar No. 13772
300 South Fourth Street, Suite 830
Las Vegas, Nevada 89101
*Attorneys for Defendant
American Express*

David H. Krieger, Esq.
Nevada Bar No. 9086
8985 S. Eastern Ave., Suite 350
Henderson, NV 89123
Attorneys for Plaintiff

ORDER

IT IS SO ORDERED.

DATED May 23, 2018



UNITED STATES DISTRICT JUDGE
UNITED STATES MAGISTRATE JUDGE